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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ABBEY DENTAL CENTER, INC., a Nevada
 Corporation,

Plaintiff,

vs.

CONSUMER OPINION LLC, a Nevada
 Limited liability company; DOES 1-10; and
 ROE ENTITIES 1-10, inclusive,

Defendant(s).

Case No. 2:15-cv-02069-GMN-PAL
STIPULATION AND (PROPOSED)
ORDER TO STAY PROCEEDINGS
(2nd Request)

Plaintiff, ABBEY DENTAL CENTER, INC., and Defendant, CONSUMER OPINION
 LLC, by and through their respective, undersigned counsel, do hereby stipulate and agree as
 follows:

1. The aforesaid parties are currently actively engaged in settlement negotiations.
2. On January 6, 2016, the parties stipulated to stay the proceedings in this matter
 for thirty (30) days, in order to allow the parties to facilitate settlement.

1 3. The Court entered the parties' stipulation as an Order on January 14, 2016.

2 4. The Court's Order is due to expire on February 5, 2016.

3 2. As settlement discussions continue, and in an effort to facilitate those efforts,
4 as well as to minimize attorneys' fees and other legal expenses, the parties believe that the
5 present civil action should be stayed for an additional thirty (30) days.

6 3. Therefore, the parties agree that the Court may enter the following Order and
7 request that the Court do so accordingly:

8 a. Except as otherwise provided below, this action shall be stayed for a
9 period of thirty (30) days from the date this stipulation is filed with the Court.

10 b. The stay shall immediately terminate upon Plaintiff's filing with the
11 Court, and serving upon Defendant, a notice that Defendant must file an answer to Plaintiff's
12 complaint in this action or otherwise respond to same in accordance with the *Federal Rules of*
13 *Civil Procedure* and by no later than twenty-one (21) days after service of the notice.

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1 c. The parties stipulate that nothing in this delay shall be deemed to prejudice
2 Defendant's right to file an Anti-SLAPP motion, under NRS 41.635 *et. seq.*

3 **SO STIPULATED AND AGREED** on this 3rd day of February, 2016.

4 **THE AMIN LAW GROUP, NV., LTD.**

RANDAZZA LEGAL GROUP, PLLC

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14 **IT IS SO ORDERED.**

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UNITED STATES DISTRICT JUDGE

Dated: _____